

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

STEFAÑO GRANATA, et al.,

Plaintiffs,

-against-

ANDREA JOY CAMPBELL, in her official  
capacity as Attorney General of the  
Commonwealth of Massachusetts, et al.,

Defendants.

Civil Action No. 1:21-cv-10960-DJC

**MOTION TO ADMIT  
WILLIAM V. BERGSTROM  
*PRO HAC VICE***

The plaintiffs in the above-captioned matter, in accordance with Local Rule 83.5.3 of the Rules of this Court, hereby respectfully move for the admission of William V. Bergstrom, *pro hac vice*. As grounds therefore, the plaintiffs state:

1. William V. Bergstrom is admitted to practice and is in good standing before the State bars of the District of Columbia and Nebraska, and the following federal courts: the United States District Court for the District of Nebraska; the United States Courts of Appeals for the Second, Third, Fourth, Fifth, Seventh, Eighth, and Eleventh Circuits; and, the United States Supreme Court.
2. William V. Bergstrom has reviewed and is familiar with the Local Rules of this Court.
3. The undersigned, an attorney admitted to practice and in good standing before this Court, has appeared in this action.

As further grounds therefor, and in support whereof, the plaintiffs rely upon the accompanying affidavit of William V. Bergstrom.

Respectfully submitted,

/s/ Richard C. Chambers, Jr., Esq.

Richard C. Chambers, Jr., Esq.  
(BBO# 651251)  
CHAMBERS LAW OFFICE  
220 Broadway, Suite 404  
Lynnfield, MA 01940  
Office: (781) 581-2031  
Cell: (781) 363-1773  
Fax: (781) 581-8449  
Email: Richard@chamberslawoffice.com

*Counsel for Plaintiffs*

Dated: January 8, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on January 8, 2025, this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Respectfully submitted,

/s/ Richard C. Chambers, Jr., Esq.

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# DECLARATION OF WILLIAM V. BERGSTROM

I, William V. Bergstrom, hereby declare under penalty of perjury, that the following information is true to the best of my knowledge and state the following:

1. I am an attorney with an office in Washington, DC. I am over 18 years of age and am competent to testify on my own behalf.
2. I am a member in good standing of every bar and court I am currently admitted to practice law before. Specifically, I am a member in good standing of the State bars of the District of Columbia and Nebraska, and the following federal courts: the United States District Court for the District of Nebraska; the United States Courts of Appeals for the Second, Third, Fourth, Fifth, Seventh, Eighth, and Eleventh Circuits; and, the United States Supreme Court.
3. There are no disciplinary charges pending against me in any jurisdiction. I have never been disciplined or sanctioned by a court or bar association.
4. I have never been convicted of any crime.

5. I have reviewed and become familiar with the Local Rules of the United States District Court for the District of Massachusetts.

6. A regular member of the bar of this Court is advancing the present motion and has filed a notice of appearance in this case.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 8th day of January, 2025.

/s/ William V. Bergstrom

William V. Bergstrom  
COOPER & KIRK, PLLC  
1523 New Hampshire Ave., N.W.  
Washington, D.C. 20036  
Telephone: (202) 220-9600  
Facsimile: (202) 220-9601  
wbergstrom@cooperkirk.com

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I, Richard C. Chambers, Jr., counsel for Plaintiffs in the above captioned matter, hereby certify that, pursuant to Rule 7.1(A)(2) of the Local Rules of the United States District Court of Massachusetts, I conferred with Assistant Attorney General, counsel for Defendants, on January 8, 2025, by email regarding this motion, and Assistant Attorney General informed that the Defendants assented to this motion.

Respectfully submitted,

/s/ Richard C. Chambers, Jr., Esq.

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